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U.S. Department of Transportation
400 Seventh Street
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Docket Number FAA-2003-16772
Repair Stations: Service Difficulty Reporting; Final Rule

Greetings:

Thank you for the opportunity to review and respond to the "Repair Stations: Service Difficulty Reporting; Final Rule".

United Technologies Corporation (UTC), responding through Pratt & Whitney Division, has reviewed the subject document on behalf of United Technologies Corporation's forty-eight (48) 14 CFR Part 145 foreign and domestic repair stations. We believe that the changes in the Final Rule adequately address the comments we provided to the FAA on November 10, 2000 in response to the information collection requirements imposed in the final rule on Service Difficulty Reports, published in the *Federal Register* (Docket No. 28293). These comments, as well as others, were echoed by industry at the December 11, 2000 meeting with the FAA, hosted by the Manager, Continuous Airworthiness Maintenance Division. We thank the FAA for its review and response to industry's concerns and ours on this important matter.

We believe that the Final Rule is acceptable. However, we would offer a few comments for consideration. We believe that the addition of the word "serious", to describe what "failure, malfunction, or defect" must be reported, was beneficial. Although the interpretation of "serious" may be open to discussion, it does allow a repair station to use its expertise and experience to draw a conclusion as to what is serious and what is routine. We suggest that guidance material could further clarify the use of the word by making reference to those sections of parts 21, 121, 125 and 135 that deal with reporting failures, malfunctions and defects, as example of what is considered "serious". To some degree, the new Section 221(c) already leads to this conclusion.

As stated in our UTC April 20, 2001 response to "Draft AC 120-SDR, Service Difficulty Report (Air Operator/Air Agency)", additional clarity and reduced economic impact could be gained by excluding failures, malfunctions and defects found during shop maintenance and testing of aircraft engines, powerplants, propellers and components that are covered by manufacturers' manuals and/or technical data and are determined to be routine by the certificate holder. This clarification would be appropriate in guidance

material. Normally, the fact that routine “events” are provided for indicates that these are expected during maintenance. Such guidance would clarify that the repair station may make a judgment of seriousness based on its expertise and experience.

Respectfully submitted for United Technologies Corporation,

/s/ Joseph J. Sirico

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